

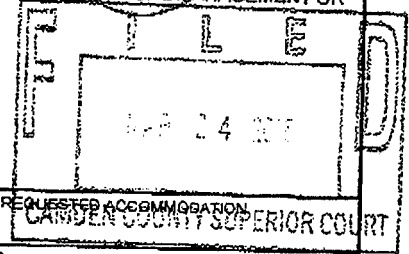
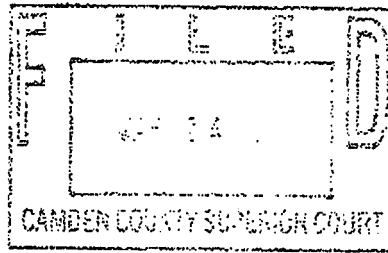


Appendix XII-B1

03-24-2015

CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
 <p>Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</p>		PAYMENT TYPE: <input checked="" type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
		CHG/CK NO. 1314	
		AMOUNT: 350.00	
		OVERPAYMENT:	
		BATCH NUMBER: 825	
ATTORNEY / PRO SE NAME Peter Kober, Esq.		TELEPHONE NUMBER (856) 761-6090	COUNTY OF VENUE Camden
FIRM NAME (if applicable) Kober Law Firm, LLC		DOCKET NUMBER (when available) C1024-15	
OFFICE ADDRESS 1876 Greentree Rd Cherry Hill, NJ 08003		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Reinaldo Kuri, Plaintiff		CAPTION Reinaldo Kuri, Plaintiff v. TD Bank, Defendant	
CASE TYPE NUMBER (See reverse side for listing) 618	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input checked="" type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input checked="" type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: Peter Kober			





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Peter Kober, Esq.
006481979
Kober Law Firm, LLC
1876 Greentree Rd
Cherry Hill, NJ 08003
856-761-5090
Attorney for Plaintiff, Reinaldo Kuri

REINALDO KURI,

Plaintiff

v.

TD BANK,

Defendant

Superior Court of New Jersey

Law Division: Camden County
Civil Part

Docket No. L1124-15

CIVIL ACTION

COMPLAINT

Plaintiff, REINALDO KURI, residing at 901 Collings Avenue in the Borough of Collingswood, County of Camden, and State of New Jersey, complaining of Defendant, states as follows:

COUNT I

1. At all times mentioned herein, Plaintiff, REINALDO KURI, resided at 901 Collings Avenue in the Borough of Collingswood, County of Camden, and State of New Jersey.
2. At all times mentioned herein, Defendant, TD BANK, was a corporation organized, existing, governed by and operating under the laws of New Jersey, and in possession and control of business premises located at 101 Haddonfield Road in the Township of Cherry Hill, County of Camden, and State of New Jersey.
3. On or about the month of February, 2014, Plaintiff, REINALDO KURI, assumed a position as teller service manager as an employee of Defendant, TD BANK, with a work location at the aforesaid business premises located at 101 Haddonfield Road in the Township of Cherry Hill, County of Camden, and State of New Jersey.
4. On or about the 10th day of June, 2014, Defendant, TD BANK, through its managers, agents, and employees, willfully and unlawfully put Plaintiff, REINALDO KURI, on a performance improvement plan, which performance improvement plan continued to

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CLERK OF COURT

the date of Plaintiff, REINALDO KURI's termination on or about the 25th day of November, 2014.

5. Furthermore, until his transfer from the aforesaid work location at 101 Haddonfield Road in the Township of Cherry Hill, County of Camden, and State of New Jersey, on or about the 12th day of September, 2014, Plaintiff, REINALDO KURI, was subjected to harassment, bullying and discrimination in the workplace, all conducted by managers, agents and employees of Defendant, TD BANK, which harassment, bullying and discrimination made his workplace a hostile work environment.
6. On information and belief, Plaintiff, REINALDO KURI, states that Defendant, TD BANK, through its managers, agents and employees, subjected Plaintiff to
 - The aforesaid performance improvement plan, and
 - The aforesaid harassment, bullying and discrimination

based on a perception on the part of said managers, agents and employees concerning

- Plaintiff's affectational preferences or sexual orientation, and/or
 - Plaintiff's disability
7. Defendant, TD BANK's actions, by and through its managers, agents and employees as aforesaid, were in violation of the Law Against Discrimination, N.J.S.A. 10:5-1 et seq.
 8. As a direct and proximate result of the unlawful acts of intimidation, hostility, retaliation, and discrimination in the workplace by Defendant, TD BANK, by and through its managers, agents and employees as aforesaid, Plaintiff, REINALDO KURI, has suffered aggravation of his underlying disability and termination from employment, and has suffered and continues to suffer wage loss, great humiliation, shame, inconvenience, mental suffering, emotional distress and anguish, all of which may be expected to continue into the future.

WHEREFORE, Plaintiff, REINALDO KURI, requests judgment against Defendant, TD BANK, for

- Compensatory damages
- Attorney's fees
- Costs of suit
- Any other relief which the court may deem just

COUNT II

1. Plaintiff, REINALDO KURI, repeats and reiterates the statements made in the First Count, and incorporates the same by reference as if fully set forth at length herein.
2. Defendant, TD BANK's actions, by and through its managers, agents and employees, in subjecting Plaintiff to

- The aforesaid performance improvement plan, and
- The aforesaid harassment, bullying and discrimination

were in violation of a clear mandate of public policy, giving rise to a cause of action under the Constitution of the State of New Jersey and Pierce v. Ortho Pharmaceutical Corp., 84 N.J. 58 (1980).

3. As a direct and proximate result of the unlawful acts of intimidation, hostility, retaliation and discrimination in the workplace by Defendant, TD BANK, by and through its managers, agents and employees as aforesaid, Plaintiff, REINALDO KURI, has suffered aggravation of his underlying disability and termination from employment, and has suffered and continues to suffer wage loss, great humiliation, shame, inconvenience, mental suffering, emotional distress and anguish, all of which may be expected to continue into the future.

WHEREFORE, Plaintiff, REINALDO KURI, requests judgment against Defendant, TD BANK, for

- Compensatory damages
- Attorney's fees
- Costs of suit
- Any other relief which the court may deem just

JURY DEMAND

Plaintiff, REINALDO KURI, demands a trial by jury on all issues which are triable by a jury in this action, pursuant to R. 1:8-2(b) and R. 4:35-1(a).

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:5-1(c), Peter Kober, Esq. is designated as trial counsel for Plaintiff, REINALDO KURI, in the above matter.

DATED: March 23 2015

Respectfully submitted,

Peter Kober

Peter Kober, Esq. 006481979

Kober Law Firm, LLC

CERTIFICATION OF NO OTHER ACTIONS

Pursuant to R. 4:5-1(b)(2) it is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. In addition, I recognize the continuing obligation of each party to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

DATED: March 23 2015

Peter Kober

Peter Kober, Esq. 006481979

Kober Law Firm, LLC

CAMDEN COUNTY
SUPERIOR COURT
HALL OF JUSTICE
CAMDEN NJ 08103
COURT TELEPHONE NO. (856) 379-2200
COURT HOURS 8:30 AM - 4:30 PM
TRACK ASSIGNMENT NOTICE

DATE: MARCH 25, 2015
RE: KURI VS TD BANK
DOCKET: CAM 1, -001124 15

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON ROBERT G. WILLEMY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 101
AT: (856) 379-2200 EXT 3060.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING. PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE WITH R.0:5A-2.

ATTENTION:

ATTY: PETER KORER
KORER LAW FIRM LLC
1876 GREENTREE ROAD
CHERRY HILL NJ 08003

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